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7 **UNITED STATES BANKRUPTCY COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**  
9

10 In Re ) **BK Case No. 8:21-bk-11710-SC**  
11 )  
12 JAMIE LYNN GALLIAN ) **Chapter 7**  
13 )  
14 Debtor. ) **APPELLANT'S STATEMENT OF ISSUES**  
15 )  
16 ) **ON APPEAL [Docket 600]**  
17 )  
18

19 TO THE COURT AND INTERESTED PARTIES: Debtor/Appellant, Jamie Lynn  
20 Gallian, hereby submits her Statement of Issues on Appeal.

21 1. Did the Court err in Granting the Trustee's Motion for Approval of Sale of the  
22 Debtor's Homestead Dwelling?

23 2. Did the Court err in Granting the Trustee's Motion for Turnover of the Debtor's  
24 Homestead Dwelling?

25 3. Did the Court err in Determining the Buyer of the Debtor's Homestead Dwelling was  
26 a good faith purchaser pursuant to 11 U.S.C. Section 363(m).

27 4. Did the Court err by ignoring its numerous prior rulings that J-Pad did not lend any  
28 money to J-Sandcastle and therefore was owed no money by J-Sandcastle?

5. Did the Court err in Determining that the Trustee was entitled to collect anything on  
the J-Pad Lien?
6. Did the Court err in Determining that the J-Pad Lien was valid and enforceable  
against the Debtor's Homestead Dwelling?
7. Did the Court err in Determining that the Trustee may sell the Debtor's Homestead  
Dwelling even though there was no non-exempt equity in the Property?
8. Did the Court err in dismissing or ignoring the Debtor's argument that her exempt  
interest in the property includes her right to continued possession of the property, and  
that right is not property of the estate and may not be sold by the Trustee?
9. Did the Court err in failing and refusing to apply California exemption law to the sale  
of the Debtor's Homestead Dwelling by allowing the Trustee to sell the Property even  
though the sale did not generate sufficient proceeds to satisfy the entirety of the  
Debtor's exemption in her equitable interest in the Property?
10. Did the Court err in allowing the Trustee to sell the Property free and clear of the  
Debtor's exempt equitable interest in the Property in violation of 11 U.S.C. Section  
363(f)?
11. Did the Court err in dismissing or ignoring the Debtor's arguments on the grounds  
that her arguments were an improper collateral attack on the Court's previous  
Judgment in Adversary Action 8:23-ap-1064-SC?
12. Did the Court err in denying the Debtor's Motion for Stay Pending Appeal?
13. Did the Court err in determining that Gallian had a low likelihood of prevailing on  
appeal?
14. Did the Court err in determining that the harm to the Trustee in staying the Court's  
orders outweighed the irreparable harm caused to Debtor by denying her Motion for  
Stay Pending Appeal?
15. Did the Court err in issuing its Supplemental Orders [Docket 598 and 599] based  
solely on the Declaration of Eric Israeal [Docket 597] without giving the Debtor an  
opportunity to respond to that Declaration or an opportunity to be heard on the

1 propriety of the Supplemental Orders sought by the Trustee?

2 16. Did the Court err in basing its decisions and orders on evidence and authorities that  
3 were not included in the Trustee's moving documents or replies, and without giving  
4 the Debtor an opportunity to be heard with respect to that extraneous evidence and  
5 authorities?

6 Dated: April 28, 2025

7 CHRISTOPHER L. BLANK, ATTORNEY  
8 AT LAW, PC

9 By: /S/Christopher L. Blank  
10 Christopher L. Blank, Attorney for Debtor  
11 Jamie Lynn Gallian

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

2973 Harbor Blvd. #506, Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*):

### APPELLANT'S DESIGNATION OF RECORD ON APPEAL

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) April 28, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See Attached

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 28, 2025 Christopher L. Blank  
Date Printed Name

/S/Christopher L. Blank  
Signature

**SERVICE LIST**

8:21-bk-11710-SC Notice will be electronically mailed to:

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Bradford Barnhardt on behalf of Plaintiff Houser Bros. Co.  
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Laila Rais on behalf of Plaintiff Houser Bros. Co.

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